

1 HEATHER E. WILLIAMS, #122664
2 Federal Defender
3 MEGAN T. HOPKINS, #294141
4 Assistant Federal Defender
5 801 I Street, 3rd Floor
6 Sacramento, CA 95814
7 Telephone: 916-498-5700/Fax: 916-498-5710

8 Attorney for Defendant
9 ELIZABETH ACUNA

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Case No. 2:22-cr-00012-TLN
Plaintiff,)
v.) STIPULATION AND ORDER TO
ELIZABETH ACUNA,) CONTINUE CHANGE OF PLEA HEARING
Defendant.)
) Date: September 15, 2022
) Time: 9:30 a.m.
) Judge: Hon. Troy L. Nunley
)

IT IS HEREBY STIPULATED, by and between the parties, through their respective
counsel, Assistant United States Attorney Alstyn Bennett, counsel for plaintiff, and Assistant
Federal Defender Megan T. Hopkins, counsel for defendant Elizabeth Acuna, that the change of
plea hearing scheduled for August 25, 2022, at 9:30 a.m. be continued to **September 15, 2022 at
9:30 a.m.**

The parties have executed a plea agreement and Rule 20 waiver form, however, in order
to effectuate the global resolution and Rule 20 transfer agreed upon, the parties need to work
with the US Marshal Service to transport Ms. Acuna to Oregon, before proceeding with a change
of plea. The continuance is requested to afford the parties additional time to make the necessary
logistical arrangements and file the appropriate documents with the US Marshal Service to
effectuate the transfer. It is anticipated that the change of plea hearing in this Court will be
vacated upon confirmation that the transfer has been approved, and the change of plea will

1 proceed in the District of Oregon. The parties will keep the Court informed should a Court order
2 be required or a hearing be necessary in advance of the September 15, 2022 date.

3 For the foregoing reasons, counsel and the defendant agree that the Court should exclude
4 the time from August 25, 2022, through September 15, 2022, when it computes the time within
5 which trial must commence under the Speedy Trial Act, pursuant to 18 U.S.C. §3161(h)(7), and
6 Local Code T4. Counsel and the defendant further agree that the ends of justice served by the
7 Court granting this continuance outweigh the best interests of the public and the defendant in a
8 speedy trial.

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10 Dated: August 23, 2022

Respectfully submitted,

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12 HEATHER E. WILLIAMS
Federal Public Defender

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14 /s/ Megan T. Hopkins
15 MEGAN T. HOPKINS
Assistant Federal Defender
Attorney for Defendant
Elizabeth Acuna

16 PHILLIP A. TALBERT
17 United States Attorney

18 DATED: August 23, 2022

19 /s/ Alstyn Bennett
20 ALSTYN BENNETT
Assistant United States Attorney
21 Attorney for Plaintiff

ORDER

IT IS HEREBY ORDERED that the change of plea hearing is continued to **September 15, 2022, at 9:30 a.m.** It is FURTHER ORDERED that the time from the date of the parties stipulation, up to and including September 15, 2022, is excluded from computation of time within which the trial of this case must commence under the Speedy Trial Act, pursuant to 18 U.S.C. §§3161(h)(7), and Local Code T4.

Dated: August 23, 2022

Troy L. Nunley
United States District Judge